Scott M. Seidel SBRA V Trustee 6505 W. Park Blvd., Ste. 306 Plano, Texas 75093

IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

DOGS ARE PEOPLE TOO, LLC, et al.¹

BEBTOR

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CASE NO. 24-33079-swe11V

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Jointly Administered

FIRST FEE APPLICATION COVER SHEET

Fee Application of: Scott M. Seidel, SBRA V Trustee

Fee Application dates: October 8, 2024- June 20, 2025

Status of Case: Plan Confirmed

Retainer Received: \$10,500.00 Amount Previously Paid: \$0

Amount Requested: Reduction:

Fees: \$6,815.00 Vol. Fee Reduction: \$0.00

Expenses: \$66.10 Vol. Expenses Reduction: \$0.00 Total Fees and Expenses: \$6881.10 Total Reduction: \$0.00

By: <u>/s/ Scott M. Seidel</u>

 $^{^{1}}$ The Debtors in these Chapter 11 cases include: Dogs Are People Too, LLC; Copeford Holdings, LLC SBRA V TRUSTEE'S FIRST AND FINAL APPLICATION FOR COMPENSATION

SBRA V Trustee

IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

IN RE:	
DOGS ARE PEOPLE TOO, LLC, et al. ²	CASE NO. 24-33079-swe11V
Debtor	Jointly Administered

FIRST AND FINAL APPLICATION OF SUBCHAPTER V TRUSTEE FOR PAYMENT OF FEES AND REIMBURSEMENT OF EXPENSES

YOUR RIGHTS MAY BE AFFECTED BY THE RELIEF SOUGHT IN THIS PLEADING. YOU SHOULD READ THIS PLEADING CAREFULLY AND DISCUSS IT WITH YOUR ATTORNEY, IF YOU HAVE ONE IN THIS BANKRUPTCY CASE. IF YOU OPPOSE THE RELIEF SOUGHT BY THIS PLEADING, YOU MUST FILE A WRITTEN OBJECTION, EXPLAINING THE FACTUAL AND/OR LEGAL BASIS FOR OPPOSING THE RELIEF.

NO HEARING WILL BE CONDUCTED ON THIS APPLICATION UNLESS A WRITTEN OBJECTION IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT, EARLE CABELL FEDERAL BUILDING, 1100 COMMERCE STREET, ROOM 1254, DALLAS, TEXAS 75242-1496 AND SERVED UPON THE PARTY FILING THIS PLEADING ON OR BEFORE JULY 17, 2025, WHICH IS <u>AT LEAST TWENTY-FOUR (24) DAYS FROM THE DATE OF SERVICE</u> SHOWN IN THE CERTIFICATE OF SERVICE UNLESS THE COURT SHORTENS OR EXTENDS THE TIME FOR FILING SUCH OBJECTION. IF NO OBJECTION IS TIMELY SERVED AND FILED, THIS PLEADING SHALL BE DEEMED TO BE UNOPPOSED, AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT. IF AN OBJECTION IS FILED AND SERVED IN A TIMELY MANNER, THE COURT WILL THEREAFTER SET A HEARING WITH APPROPRIATE NOTICE. IF YOU FAIL TO APPEAR AT THE HEARING, YOUR OBJECTION MAY BE STRICKEN. THE COURT RESERVES THE RIGHT TO SET A HEARING ON ANY MATTER.

TO THE HONORABLE SCOTT W. EVERETT, U.S. BANKRUPTCY JUDGE:

The Debtors in these Chapter 11 cases include: Dogs Are People Too, LLC; Copeford Holdings, LLC SBRA V TRUSTEE'S FIRST AND FINAL APPLICATION FOR COMPENSATION

COMES NOW, Scott M. Seidel, SBRA V Trustee, submitting this his *First and Final Application of Subchapter V Trustee for Payment of Fees and Reimbursement of Expenses*, pursuant to 11 U.S.C. §330, and, in support hereof, would show the Court as follows:

- 1. Dogs are People Too, LLC (the "DAPT Debtor") commenced this proceeding by filing a Chapter 11 proceedings under Section 1101 of the Bankruptcy Code on September 30, 2024.
- 2. Copeford Holdings, LLC (the "Copeford Debtor") an associated entity also filed a Chapter 11 proceeding under Section 1101 of the Bankruptcy Code on September 30, 2024.
- 3. The Debtors collectively operated a dog boarding, grooming and daycare facility on the property they owned. The debtors elected to file this case pursuant Subchapter V of the United States Bankruptcy Code.
- 4. Scott M. Seidel was appointed Subchapter V Trustee (the <u>"Trustee"</u>) by the Office of the United States Trustee on October 8, 2024.
- 5. On October 11, 2024, the Court entered its Order Regarding Filing of Pleadings and Directing Joint Administration of Cases.
- 6. Pursuant to this Application, the Sub V Trustee seeks fees in this Application totaling \$6,815.00 and Expenses of \$66.10 for the Application period of October 8, 2024, through June 20, 2025, on a final basis. The debtor has paid the Sub V Trustee, per Court order [Doc. No.62], deposits totaling \$10,500.
- 7. A copy of the billing statements of Trustee are attached hereto as Exhibit "A." Exhibit "A" sets forth on a daily basis the nature of the services rendered by Trustee, the date on which those services were performed, and the amount of time dedicated to the particular service.

- 8. Professional fees incurred by Trustee were performed pursuant to his statutory duties under Section 1183 of the Bankruptcy Code. The principal services performed by Trustee involved the following:
 - a) Consultation with Debtor and Debtor's counsel as well creditor's counsel.
 Visitation to Debtor's business was obviated to reduce expenses
 - b) Participation in all scheduled hearings as required.
 - c) Review of Debtor's documents, plan, objections thereto and outstanding claims. Trustee also participated in discussions with creditor counsel and debtor counsel and attempted to assist in settlement conferences as well as attempted to assist the parties in obviating contested hearings and attempting to resolve multiple issues with the parties.

The Trustee billed at his standard hourly rate of \$520.00 per hour. This is Trustee's first and final fee application.

9. The Trustee seeks immediate payment of his fees following entry of the Court's Order on this Application pursuant to the United States Bankruptcy Code and authority to draw down on amounts tendered by the Debtor and being held by the Trustee, per court approval, to satisfy the fees and expenses and remit the overage to the Debtor. Applicant requests the Court retain jurisdiction to enforce payment.

WHEREFORE, PREMISES CONSIDERED, Trustee requests upon appropriate notice and opportunity for hearing, if necessary, this Court: (i) enter an order approving the First and Final Application of Subchapter V Trustee for Payment of Fees and Expenses in the total amount of \$6,881.10 on a final basis; (ii) authorize and direct the Trustee to immediately draw down on funds on hand to satisfy this request; (iii) authorize and direct Trustee to remit to the Debtor the excess \$3,618.90 within 10 days of the entry of the Order herein and prior to any dismissal or SBRA V TRUSTEE'S FIRST AND FINAL APPLICATION FOR COMPENSATION

conversion of this case; and (iv) grant the Trustee such other and further relief to which he is justly

entitled. Respectfully Submitted,

/s/ Scott M. Seidel
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6505 W. Park Blvd., Suite 306
Plano, Texas 75093
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scott@scottseidel.com
SUBCHAPTER V TRUSTEE

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing instrument was served on the parties on the attached mailing matrix either through the Court's electronic notification system as permitted by the Local Rules of the U.S. Bankruptcy Court for the Northern District of Texas, or by first class United States Mail, postage prepaid on this the 23rd day of June 2025.

/s/ Scott M. Seidel